

Appl. No. 10/647,762  
Amdt. dated 09/26/2005  
Reply to Office action of 09/02/2005

REMARKS/ARGUMENTS

Examiner's ruling with respect to the restriction of claims has been duly noted, We have, accordingly, canceled claims 9-20 and will file a divisional application at the appropriate time.

Following examiner's helpful suggestion, a new title has been provided.

Reconsideration is requested of all rejections based on objections to the specification:

Proper antecedent basis for claims 2, 3, and 8 has now been provided through amendment of the relevant paragraphs in the specification.

Reconsideration is requested of all rejections based on 35 U.S.C. 102:

With regard to Han et al.,

Reconsideration of the 35 USC 102(e) rejection of Claims 1-8, as being clearly anticipated by Han et al. (US 2005/0024769), is requested, based on the following:

Applicants swear behind reference US 2005/0024769, by way of the attached Rule 1.131 Declaration, indicating that the invention claimed in the instant application was invented prior to the August 1, 2003 filing date of the reference.

With regard to Hsu et al., we note that for a 102-based rejection to be valid, it must teach ALL features of the rejected application. At least three such features that are disclosed in the present invention are not taught by Hsu et al. These are:

(a) (1<sup>st</sup> paragraph page 7) "... insulating layer 14b of photoresist is applied..... and then hard baked between about 150 and 250 °C for between about 1 and 5 hours." Hsu do not hard bake any of the photoresist featured in their invention. We can infer this from the fact that no reference is made to such a step and particularly because hard baked photoresist is very difficult to remove so would be counter-productive for the Hsu process.

(b) (immediately following (a)) "A key feature of the invention is that layer 14b is thick enough so that, after the baking process and planarization, its thickness is sufficient for there to be between about 1 and 2 microns of it extending above the tops of the copper coils 20. Layer 14b must not be allowed to be part of the head's ABS (air bearing surface) since hard-baked photoresist is incompatible with the slider process under which the ABS operates.

(c) (2<sup>nd</sup> paragraph page 7) "Now follows another key feature of the invention. As shown in FIG. 5, the entire structure is covered by alumina layer 52, which is between about 5 and 6 microns thick. This is followed by planarization down to the level of lower coil 20. The presence of layer 52 during the final stages of the planarization process serves to stabilize the baked photoresist of layer 14b so that it does not delaminate as the top surface of coil 20 is approached. This makes it possible to terminate planarization as soon as the coil is exposed, the end result being as illustrated in FIG. 6."

Item (a) is already part of claim 1 and, following examiner's suggestion, claim 1

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has been amended to include item (c).

Reconsideration is requested of all rejections based on 35 U.S.C. 103:

With regard to our claim 6, as discussed above, Hsu do not teach hard baking of their photoresist. Nor would they, or anyone skilled in the art, be motivated to do so as such a step would be counter-productive for them.

With regard to our claim 7, said layer of alumina is deposited onto a layer of hard baked photoresist (claim 1 line 10), thereby distinguishing it from the alumina layer referred to in Hsu.

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In light of the foregoing arguments and amendments, applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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By

A handwritten signature in black ink, appearing to read 'SBA', written over a horizontal line.

Stephen B. Ackerman

Reg. No. 37761